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November 1, 2002

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Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Rc: *Dobson Cellular Systems, Inc. E911 Quarterly Report -
CC Docket No. 94-102*

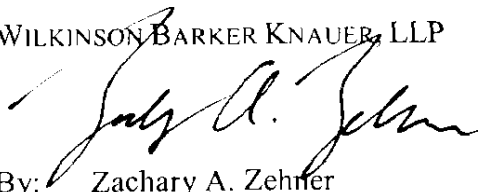
Dear Ms. Dortch:

Dobson Cellular Systems, Inc. and its subsidiaries, by its attorneys, hereby submit the attached Quarterly Report on their progress toward and compliance with the terms and conditions of the *Order to Stay* and the Commission's E911 rules.

If there are any questions regarding this matter, please contact the undersigned

Sincerely,

WILKINSON BARKER KNAUER LLP

By:  Zachary A. Zehner

Attachment

cc: David H. Solomon, Chief, Enforcement Bureau
Thomas J. Sugrue, Chief, Wireless Telecommunications Bureau
John Ramsey, Executive Director, APCO
Robert M. Gins, Counsel, APCO
Jim Goerke, Interim Executive Director, NENA
James R. Hobson, Counsel, NENA and NASNA
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¹ See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Order to Stay, 17 FCC Rcd 14841 (2002) ("*Order to Stay*").

E911 Status – Quarterly Report

November 1, 2002

Summary of Report

Pursuant to the *Order to Stay*,¹ Dobson Cellular Systems, Inc.,² as a Tier II carrier, provides in this Quarterly Report ("Report") information on all pending requests for Phase I and Phase II services received by DCS, including: the entity requesting service; the date the request was received;³ and the status of the request. For Phase I requests that have been pending for over six months, DCS has also included the projected deployment date (if available), a brief description of the reasons for the delay, and steps it has taken to resolve the issues causing the delay. Detailed information regarding the requests is contained in the attached table.

Phase I Service

DCS has received 69 requests for Phase I services and has activated service in 60 of these jurisdictions. The carrier has worked diligently with its third-party location solution vendors, TCS Corp. and Intrado, as well as the public safety community, in coordinating Phase I deployment. **As** discussed in the table, in several counties, Phase I services were not activated within six months of the date of the PSAP request for a variety of reasons. For instance, in several cases, DCS received requests from PSAPs that had not received the necessary funding from the respective state to coordinate trunking upgrades. In other cases, DCS was the first carrier to receive a request from the jurisdiction and it and the PSAPs experienced numerous administrative and technical delays in coordinating Phase I deployment. As a demonstration of its good faith, Dobson is treating the remaining 9 Phase I requests as valid, although several would no longer be active pursuant to Section 20.18(j) and the *Richardson* criteria.⁴ The company remains committed to working with its vendors, the PSAPs, and the states, in order to deploy Phase I services in these jurisdictions as soon as possible.

Phase II Service

A. Deployment Preparation

As discussed in its waiver petition, DCS is a mid-sized carrier servicing predominantly rural and suburban markets in 19 states. The company relies primarily upon a TDMA-based network of base stations and switching equipment. **As** a result of the lack of commercial availability of compliant handset-based Phase II location solutions for TDMA carriers, the company has taken steps to prepare to deploy a network-based solution.

DCS's network consists of approximately 23 Mobile Switching Centers, a majority of which utilize equipment manufactured by Nortel Networks ("Nortel"), although DCS also uses some Lucent Technologies ("Lucent") TDMA network equipment. DCS has worked with these

¹ See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Order to Stay, 17 FCC Rcd 14841 (2002) ("*Order to Stay*").

² The instant Report is filed on behalf of Dobson Cellular Systems, Inc. and its subsidiaries (collectively "DCS").

³ As indicated in the table, the provided "request date" indicates the date the PSAP/requesting entity sent its request to DCS. This date may not correspond with the date the PSAP's/requesting entity's request was "valid" per Section 20.18(j) of the rules.

⁴ 47 C.F.R. § 20.18(j); *Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Petition of City of Richardson*, CC Docket No. 94-102, Order, 16 FCC Rcd 18982 (2001) ("*Richardson*").

equipment vendors to prepare for Phase II deployment, as all switch upgrades necessary to supply Phase II services were completed by Lucent by August, 2002 and by Nortel by June, 2002.

In addition, DCS is in final contract negotiations with a leading provider of Phase II network-based location solutions. As a part of these negotiations, DCS has agreed not to reveal the vendor's name in this Report; however, it believes that a contract will be executed in the near future. The vendor has represented that at this time it appears that DCS will be able to provide compliant Phase II services in response to the PSAP requests discussed below. In fact, DCS hopes to deploy Phase II services to 100% of the area in these jurisdictions by the March 2003 deadline, and thus exceed its obligations.

B. Phase II Requests

DCS has received requests for Phase II service from the following three jurisdictions: Erie County, PA; Genesee County, NY; and Cattaraugus County, NY. In response, on October 3rd, 2002, the company sent correspondence to the contacts for these jurisdictions, stating that it is tentatively considering each request "valid" and intends to provide Phase II services by March 1, 2003 or within six months of the PSAP's request, whichever is later. Nevertheless, to ensure that it may properly prioritize its E911-designated resources, DCS has requested each of these PSAPs to provide documentation pursuant to the *Richardson* proceeding.⁵ DCS has not yet received a response to its request from these PSAPs, but is proceeding in good faith.

C. Other

As a Tier II provider employing a network-based Phase II solution, pursuant to the **Order to Stay**, DCS intends to provide Phase II service to at least 50 percent of a requesting PSAP's coverage area or population beginning March 1, 2003, or within six months, whichever is later, and to 100 percent of the PSAP's coverage area by March 1, 2004, or within 18 months, whichever is later. DCS remains committed to meeting these deployment benchmarks in response to valid PSAP requests for Phase II service.

In discussions with its prospective Phase II location solution vendor, however, DCS has learned that leasing and zoning issues may affect DCS' ability to meet the March 1, 2003 deployment deadline in some markets. Specifically, in order to meet the Commission's network-based accuracy requirements, its prospective vendor has informed the company that it may need to install Angle-of-Arrival ("AOA") antennas at certain cell sites in addition to the Time Difference of Arrival equipment that will be installed in individual cell sites. DCS has also been informed that installing AOA antennas may require tower modifications, lease modifications, and zoning approvals – any of which present the potential for delay.

While DCS does not currently foresee problems related to the AOA antennas, it is bringing this to the Commission's attention as a potential issue that may affect DCS's ability to provide compliant Phase II services by March 1, 2003. Furthermore, DCS brought similar matters to the Commission's attention in its original waiver request.⁶ Accordingly, if necessary, DCS may avail itself of further waiver procedures to account for the potential market-specific

⁵ *Id.*

⁶ See *Dobson Cellular Systems, Inc. Petition for Waiver of Sections 20.18(e), (f), and (h) of the Commission's Rules*, CC Docket No. 94-102, at 11-15 (filed Sept. 4, 2001).

shortcomings a network-based solution in its rural markets may present. The Commission has indicated that it will consider such requests.'

As required by the *Order to Buy*, a copy of this report is being filed with the Chief of the Enforcement Bureau, the Chief of the Wireless Telecommunications Bureau, and the Executive Directors and Counsels of **APCO**, NENA, and **NANSA**.

¹ See *Order to Stay* at ¶ 41.

**Dobson Cellular Systems, Inc.
Wireless E9-1-1 Phase I & II
Service & “Request” Summary Table**

STATUS OF PHASE I DEPLOYMENT --						
State	County	Requesting Entity Name	Request Date¹	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
MI	Kalkaska	Michigan Communications Director Association	04/30/01	Service activated on 4/08/02. All: Administrative issues.		
MI	Mason Mason	Michigan Communications Director Association	09/01/00	Service activated on 8/19/02. PSAP: PSAP was not Phase I capable at time of request.		
MI	Manistee	Michigan Communications Director Association	09/01/00	Service activated on 3/19/02. All: Administrative issues.		
MI	Missaukee Missaukee	Michigan Communications Director Association	09/01/00	Service activated on 3/19/02. All: Administrative issues.		
MI	Osceola Osceola	Michigan Communications Director Association	09/01/00	Service activated on 4/25/02. All: Administrative issues.		
MI	Lake	Michigan	09/01/00	Service activated on		

¹ Indicates date PSAP sent letter to DCS requesting service; does not correspond with date PSAP's request was “valid” per Section 20.18(j) of the rules

		Coinmunications Direcor Association		4/09/02 All: Administrative issues.		
MI	Antrim	Antrim County Sheriff Office	11/11/01	PSAP: PSAP was not Phase I capable at time of request. DCS/XYPOINT: Awaiting signaling sequences from third party provider.	DCS working to esolve deployment roblems; expects to ctivate Phase I ervice in near future.	11/05/02
MI	Charlevoix	Michigan Communications Director Association	09/01/00	Service activated on 4/08/02. All: Administrative issues.		
MI	Leelanau	Michigan Communications Director Association	39/01/00	Service activated on 3/18/02. All: Administrative issues.		
MI	Wexford	Michigan Communications Director Association	09/01/00	Service activated on 3/19/02. All: Administrative issues.		
MI	Emmet	Michigan Communications Director Association	09/01/00	Service activated on 4/09/02 All: Administrative issues		
MI	Benzie	Michigan Communications Director Association	09/01/00	Service activated on 4/09/02 All: Administrative issues.		
MI	Grand Traverse	Michigan Communications Director Association	09/01/00	Service activated on 3/18/02. All: Administrative issues.		
MI	Huron	Michigan Communications	09/01/00	Service activated on 2/15/02.		

		Director Association		All: Administrative issues.		
MI	Sanilac	Michigan Communications Director Association	19/01/00	Service activated on 2/22/02. All: Administrative issues.		
MI	Tuscola	Michigan Communications Director Association	09/01/00	Service activated on 2/13/02. All: Administrative issues.		
TX	Bastrop	CSEC	10/12/99	Service activated on 03/18/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Caldwell	CSEC	10/12/99	Service activated on 03/18/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Fayette	CSEC	10/12/99	Service activated on 03/18/01. PSAP/State: PSAP readiness issues and Council of Government administrative issues.		
TX	Lee	CSEC	10/12/99	Service activated on 03/18/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Gonzales	CSEC	10/12/99	Service activated on 01/15/01.		

TX	Jackson	CSEC	10/12/99	PSAP/State: PSAP readiness and Council of Government administrative issues. Service activated on 01/15/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Lavaca	CSEC	10/12/99	Service activated on 01/15/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Milam	CSEC	10/12/99	Service activated on 02/13/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Hamilton	CSEC	10/12/99	Service activated on 02/13/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Walls	CSEC	10/12/99	Service activated on 02/28/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Freestone	CSEC	10/12/99	Service activated on 02/28/01.		

				PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Limestone	CSEC	10/12/99	Service activated on 02/28/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Bosque	CSEC	10/12/99	Service activated on 02/28/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Hill	CSEC	10/12/99	Service activated on 02/28/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Colorado	CSEC	10/12/99	Service activated on 02/21/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Fort Bend	CSEC	10/12/99	Service activated on 02/21/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Matagorda Matagorda	CSEC	10/12/99	Service activated on 02/21/01.		

				PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Wharton	CSEC	10/12/99	Service activated on 02/21/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Navarro	CSEC	10/12/99	Service activated on 04/15/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Erath	CSEC	10/12/99	Service activated on 04/15/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Armstrong	CSEC	10/12/99	Service activated on 02/23/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Carson	CSEC	10/12/99	Service activated on 02/23/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Collingsworth	CSEC	10/12/99	Service activated on 02/23/01.		

				PSAP/State: PSAP readiness and Council of Government administrative issues.		
X	Donely	CSEC	10/12/99	Service activated on 02/23/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
X	Gray	CSEC	10/12/99	Service activated on 02/23/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
X	Hansford	CSEC	10/12/99	Service activated on 02/23/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
X	Hemphill	CSEC	01/12/99	Service activated on 02/23/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
X	Hutchinson	CSEC	01/12/99	Service activated on 02/23/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
X	Lipscomb	CSEC	01/12/99	Service activated on 02/23/01.		

				PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Ochiltree	CSEC	0/12/99	Service activated on 02/23/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Roberts	CSEC	0/12/99	Service activated on 12/23/01, PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Wheeler	CSEC	0/12/99	Service activated on 02/23/01 PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Robertson	CSEC	10/12/99	Service activated on 04/15/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Burleson	CSEC	10/12/99	Service activated on 04/15/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Leon	CSEC	10/12/99	Service activated on 04/15/01.		

TX	Washington	CSEC	10/12/99	PSAP/State: PSAP readiness and Council of Government administrative issues		
				Service activated on 04/15/01 PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Anderson	CSEC	10/12/99	PSAP/LEC: At time of request, PSAP was not connected to SIR. Athens SIR connection and turn up was completed in September, 2002. DCS/Intrado: Test calls failed on 10/17/02, working on translation problems at the switch.	DCS will be ready to deploy Phase I service once translations are complete.	11/15/02
TX	/an Zandt	CSEC	10/12/99	PSAP/LEC: At time of request, PSAP was not connected to SIR. Athens S/R connection and turn up was completed in September, 2002. DCS/Intrado: Test calls failed on 10/17/02; working on translation problems at the switch.	DCS will be ready to deploy Phase I service once translations are complete.	1/15/02

TX	Coleman	CSEC	10/12/99	Service activated on 03/08/01 PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Brownwood	CSEC	10/12/99	Service activated on 03/08/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Comanche	CSEC	10/12/99	Service activated on 03/08/01 PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Runnels	CSEC	10/12/99	Service activated on 03/08/01 PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Eastland	CSEC	10/12/99	Service activated on 02/21/01. PSAP/State: PSAP readiness and Council of Government administrative issues.		
TX	Austin	Austin County Emergency Communications District	1114102	LEC: At time of request, PSAP awaiting completion of trunking upgrades by LEC.	DCS: Working towards deployment; Expects activation of Phase I service in near	1213 1/02

				DCS: Working on solving translation problems at switch.	future.	
OK	Cherokee	Cherokee County	3/14/02	PSAP/LEC and DCS: Administrative delay.; relating to pANI issues.	Through vendor, DCS has expressed willingness to supply pANI's to PSAP. but has yet to receive response.	12/31/02
MD	Talbot	Talbot County	8/07/02	LEC: Trunks are due 11/20/02 from LEC.	N/A	2/07/03
PA	Erie	Erie County Emergency Management Agency	04112/01	Service activated on 2/06/02. All: Administrative issues.		
PA	Crawford	Crawford County	3/26/02	LEC: Delay in PSAP receiving trunking from LEC.	DCS is ready to deploy Third party provider loading pANI's in database Call testing to begin first week November, 2002.	12/31/02
NY	Allegany	Allegany County	7/18/02	LEC: PSAP's trunks from LEC are due 11/19/02.	N/A	11/18/03
NY	Cattaraugus	Cattaraugus County Sheriff Office	05122/01	Service activated on 8/06/02. State/LEC: Cost recovery issues; LEC delay is issuing trunks to PSAP.		
NY	Chautauqua	Office of the Sheriff	06/01/01	Service activated on 5/17/02. State: Cost recovery issues.		

NY	Genesee	Office of the Sheriff	04/10/01*	LEC: LEC delays in issuing trunks to PSAP	DCS participated in conference calls with LEC to discuss and expedite resolution of Issues with trunking. DCS: Working on resolving test call issues.	11/29/02
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STAT State	OF RESPON County	TO PHASE I. Requesting Entity Name	IRIES/REQ "Request" Date	TEST-- Status	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
PA	Erie	Erie County Emergency Response Management Agency – Erie County E911 Center	4/12/2001*	- Dobson responded by letter (4/23/2001), requesting verification of capabilities and cost recovery mechanism. - Erie County ("County") did not respond. - Dobson sent letter 1013102 notifying County that it is tentatively considering request to be "valid" and plans to deliver Phase II services by 3/1/03, but also is requesting documentation pursuant to <i>Richardson</i> .	N/A	3/1/03
NY	Genesee	Office of Sheriff, Genesee County. New York	(4/10/2001)* 9/5/2002 (received 9/9/02)	- Dobson responded by letter, (dated 4/17/2001), requesting verification of capabilities and cost recovery mechanism. - Genesee County ("County") replied by letter, (dated	NIA	3/9/03

				<p>7/27/2001), stating that PSAP has been upgraded to receive Phase I (via CAS): no statement as to Phase II readiness.</p> <ul style="list-style-type: none"> - County sent “official” Phase II request 9/5/02 (received 9/9/02). indicating Phase I compliant utilizing NCAS solution. - Dobson sent letter 10/3/02 notifying County that it is tentatively considering request to be “valid” and plans to deliver Phase II services by 3/9/03, but also is requesting documentation pursuant to <i>Richardson</i>. 		
NY	Cattaraugus	Cattaraugus County Sheriff Office	5/05/02*	<ul style="list-style-type: none"> - Dobson responded by letter, (dated 8/31/02) requesting verification of capabilities and cost recovery mechanism. - Cattaraugus County (“County”) replied by email correspondence that they are capable of receiving Phase II services. - DCS sent letter 1013102 notifying County that it is tentatively considering request to be “valid” and plans to deliver Phase II services by 3/1/03, but also is requesting documentation pursuant to <i>Richardson</i>. 	N/A	3/1/03

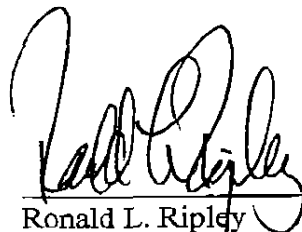
* Contact indicated entity was “requesting” deployment both Phase I and Phase II services

AFFIDAVIT OF RONALD L. RIPLEY

I, Ronald L. Ripley, do hereby declare that the following **is true and** accurate:

I am an **officer** of Dobson Cellular **Systems, Inc.** ("DCS").

I have reviewed the DCS E911 Phase II Quarterly Report ("Report") **and** to the best of my knowledge, information, or belief, all of the information contained in the Report is truthful and accurate.

A handwritten signature in black ink, appearing to read 'Ronald L. Ripley', written over a horizontal line.

Ronald L. Ripley
Vice President &
Senior Corporate Counsel

Executed on: Nov 1 2002

CERTIFICATE OF SERVICE

I, Karen S. Freeman, hereby certify that on the 1st day of November 2002, I caused copies of the foregoing "Quarterly Report" to be sent by either first class mail, postage pre-paid, or by hand delivery (*) to the following:

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